

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>UNITED STATES OF AMERICA</b>	<b>§</b>	<b>CRIMINAL NO.: H-25-146-S</b>
	<b>§</b>	
<b>v.</b>	<b>§</b>	<b>JUDGE DAVID HITTNER</b>
	<b>§</b>	
<b>MICHAEL SEERY,</b>	<b>§</b>	
<b>RICARDO OBANDO, JR.</b>	<b>§</b>	
<b>AND</b>	<b>§</b>	
<b>MATTHEW ROSAS</b>	<b>§</b>	
<b>Defendants</b>	<b>§</b>	

**GOVERNMENT’S RESPONSE TO DEFENDANTS MOTION IN LIMINE  
REGARDING PRIVILEGED CONVERSATIONS**

The Government agrees that the marital privilege applies in this case for confidential communications between Sarah Seery and Michael Seery. However, if the communications were not confidential or there is a legal exception then the Government does not agree that the privilege would apply to those conversations/statements.

The Government agrees that the therapist privilege applies in this case for confidential communications between Michael Seery and his psychotherapist, Roxanne Riefkohl.

Respectfully submitted,

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/s/ Jill J. Stotts

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